

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

|                          |   |                        |
|--------------------------|---|------------------------|
| UNITED STATES OF AMERICA | ) |                        |
|                          | ) |                        |
| v.                       | ) | Case No. 3:22-CR-00327 |
|                          | ) |                        |
| [1] CHESTER GALLAGHER    | ) | JUDGE TRAUGER          |
| [2] HEATHER IDONI        | ) |                        |
| [3] CALVIN ZASTROW       | ) |                        |
| [4] COLEMAN BOYD         | ) |                        |
| [6] PAUL VAUGHN          | ) |                        |
| [7] DENNIS GREEN         | ) |                        |

**DEFENDANTS' MOTION IN OBJECTION**  
**TO ANY CHANGES TO THE COURT'S ORAL JANUARY 26, 2024 RULING ON**  
**FINAL JURY INSTRUCTIONS**

Defendants Coleman Boyd, Chester Gallagher, Dennis Green, Heather Idoni, Paul Vaughn, and Calvin Zastrow, by and through undersigned counsel, objects to any changes of the Court's oral ruling on the final jury instructions as specifically proposed in AUSA Klopf's January 26, 2024 at 6:37 p.m. email to Katheryn Beasley.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Motion was filed electronically and served on the following by the EF/CME electronic filing system:

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This the 28 day of January 2024.

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